

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
Amendment of the Commission's Rules	)	
Regarding Dedicated Short-Range Communication	)	WT Docket 01-90
Services in the 5.850-5.925 GHz Band (5.9 GHz	)	
Band)	)	
Amendment of Parts 2 and 90 of the Commission's	)	
Rules to Allocate the 5.850-5.925 GHz Band to the	)	
Mobile Service for Dedicated Short Range	)	ET Docket No. 98-95
Communications of Intelligent Transportation	)	RM-9096
Services	)	

**REPLY COMMENTS  
OF  
THE ALLIANCE OF AUTOMOBILE MANUFACTURERS**

The Alliance hereby submits the following reply comments in the above captioned matter.

**Background**

As set forth in its Comments, the Alliance of Automobile Manufacturers is a trade association of 10 car and light truck manufacturers who account for more than 90 percent of U.S. vehicle sales. Member companies include BMW Group, DaimlerChrysler, Ford Motor Company, General Motors, Mazda, Mitsubishi Motors, Nissan, Porsche, Toyota and Volkswagen. The Alliance supports the FCC's allocation of the 5.850-5.925 GHz band (5.9 GHz band) for Dedicated Short-Range Communications (DSRC) services for Intelligent Transportation System (ITS) radio service. Wireless communications, both

between vehicles, and between vehicles and infrastructure, have the potential to significantly improve vehicle safety.

### **Part 15 Regulation of On-Board Units**

The Alliance disagrees with those commenters that suggested On-Board Units (OBUs) could operate as unlicensed devices under Part 15 regulation.<sup>1</sup> While the Alliance opposes any requirements for individual licensing of the OBU in each specific vehicle, it supports the view that Part 15 operation of OBUs would interfere with the use of 5.9 GHz DSRC for vehicle safety applications. Radio frequency interference from unlicensed devices and their noncompliance with channel controls and the message prioritization framework will undermine the projected effectiveness of vehicle safety enhancements made possible by DSRC. Unlicensed devices may have the ability to cause these same safety applications to fail during emergencies, putting lives and property unnecessarily at risk. The Johns Hopkins University Applied Physics Laboratory comments in particular, clearly explained some of the technical problems with Part 15 regulation of OBUs:

“Conformance with these highly-advanced DSRC design requirements can not be ensured by Part 15 regulation. Part 15 does not mandate adequate power, power control, clock stability or channel control to satisfy the proposed DSRC architecture. If Part 15 devices were permitted to operate without coordination, it would have the effect of increasing the noise floor and otherwise interfering with DSRC devices. Allowing limited-capability Part 15 devices to operate in the 5.9 GHz band, without requiring the additional DSRC requirements would reduce the overall performance and reliability of the frequency band.”<sup>2</sup>

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<sup>1</sup> See for example Comments of National League of Cities and National Association of Telecommunications Officers and Advisors at 11.

<sup>2</sup> Comments of Johns Hopkins University Applied Physics Laboratory at 13. See also the Comments of Intelligent Transportation Society of America at 19,20 and the Comments of International Bridge, Tunnel and Turnpike Association at Item 7.

## **Licensing OBUs by Association with RSUs**

In order to support nationwide interoperability through the adoption of a single set of DSRC standards, OBUs that are factory-installed in automobiles must not be limited to operation in specific geographical locations or particular RSU zones. The Alliance supports the comments of ITS America in this regard:

“While there will be instances where a licensee will deploy a number of On-Board Units for communication with its Roadside Units, it is expected that the majority of On-Board Units will be deployed without any association with a particular licensee or fixed system. ITS America’s goal is to support the rapid and widespread deployment of DSRC-based ITS in the band, such as through the installation of On-Board Units as standard equipment on all new vehicles sold in the United States.”<sup>3</sup>

With regard to OBUs installed as “standard equipment” by automobile manufacturers, the comments of The Johns Hopkins University Applied Physics Laboratory are particularly applicable:

“Since OBUs are general purpose devices, supporting a wide range of both private and public services, throughout the nation, it is impossible to associate these OBUs with a single specific system.”<sup>4</sup>

## **Listing of Services for Eligibility**

The Alliance is concerned that one of the views of the Public Safety Wireless Network, if adopted, could delay or preclude the use of 5.9 GHz DSRC for anticipated vehicle safety applications. Specifically:

“The PSWN Program is also in favor of the enumeration of a specific list of services that would be eligible for licensing on the 5.9 GHz band.”<sup>5</sup>

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<sup>3</sup> Comments of Intelligent Transportation Society of America at 19.

<sup>4</sup> Id. at 12

It is expected that new vehicle safety applications will continue to be developed and deployed on an ongoing basis as 5.9 GHz DSRC systems are put into service.

Administration and enforcement of a dynamically changing “specific list of services” would be expected to be difficult and time-consuming. We are concerned that limiting 5.9 GHz to “a specific list of services” could be expected to delay or defer the deployment of new vehicle safety applications that otherwise might provide immediate safety benefits to the public. We believe that implementation of the types of standards and service rules advocated in the Alliance’s Comments would avoid the concerns expressed by the PSWN.

The Alliance looks forward to reviewing the reply comments in this proceeding and appreciates the Commission’s consideration of its views regarding this important matter.

Respectfully submitted,

April 15, 2003

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<sup>5</sup> Comments of Public Safety Wireless Network at 7.